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Ace GALVANIZING, INC.
429 SOUTH 96TH STREET • SEATTLE, WASHINGTON 98108 • 762-0330

August 20, 1987

Elliott Bay/Duwamish Action Team (EBAT)
Dept. of Ecology, N.W. Regional Office
4350 - 150th Avenue N.E.
Redmond, WA 98052

Attention: Ms. Lee Dorigan

Re(s): Progress Report #1, submitted May 18, 1987

Progress Report #2, submitted June 22, 1987

Dear Ms. Dorigan:

This progress report describes the final corrective actions taken to the deficiencies and improvements suggested for completion by the N.W. Regional DOE Response Team. Additionally, this report contains a description and diagram of the Surface Water Management Plan, (storm drainage system) also requested by the Response Team. This Progress Report, like reports number one and two, will be keyed to each action number referenced in the initial report dated May 18, 1987.

Action Narrative (current status)

1. CHARACTERIZATION OF BARRELED BY-PRODUCTS AND CLEANUP OF OUTSIDE STORAGE AREA.

   Requirement: See Progress Report #1.

   Status: Waste was segregated into three (3) categories and subjected to both the E.P. toxicity tests (including copper, nickel and zinc) and the 96 hour State Fish Bioassay. All three categories of waste have been categorized as dangerous waste (DW) and will be disposed of as directed by the Seattle-King County Department of Public Health and the DOE. The company is now actively working to reduce the copper, nickel and zinc levels formed in this slag by-product so as to reduce the amount of DW generated. In the interim, the other action associated with Action Item #1; i.e., Cleanup of Outside Storage Area,has been completed as evidenced in Photo Series #1. (Area where barreled by-products were stored. Western side of Ace Galvanizing.)

2. COOLING WATER DRAINAGE FROM BOILER-BLOW DOWN (UNAUTHORIZED DISCHARGE TO STORM DRAINAGE)

   Requirement: See Progress Report #1.

   Status: Plumbing for the blow-down has been re-routed so that drainage water is collected daily within a closed bottom sump, located indoors adjacent to the boiler. Blow-down operations are

2. Continued.

conducted daily, creating approximately 20 gallons of water. This water is now collected, as stated above, in a closed-loop system and recycled into the Water Rinse Vat located in the Galvanizing Plant. (See Photo Series #2.)

3. UNAUTHORIZED DISCHARGE TO STORM DRAINAGE, SOUTH-END OF GALVANIZING BUILDING.

Requirement: See Progress Report #1.

Status: The area where the hot-dip galvanizing process takes place has been entirely contained (secondary containment). Additionally, concrete berms and drainage ditches have been constructed to direct all surface waters to the storm drainage sump located at the south-eastern end of the galvanizing building. This same sump has been enlarged to accommodate a greater flow of surface water, thus preventing surface waters from entering the galvanizing area. (See Photo Series #3.)

4. CONDITION OF DUMPSTER.

Requirement: See Progress Report #1.

Status: Only wastes suitable for landfill disposal are placed in the dumpster. The dumpster is now located under a permanent roof structure located on the western side of the Galvanizing Building, as indicated in Photo Series #4.

5. HOUSEKEEPING.

Requirement: See Progress Report #1.

Status: Containment in the form of retaining walls, run-off berms and concrete lined drainage channels have been constructed through out the facility. Employees have also been trained to improve "housekeeping" operations. (See Photo Series #5)

6. AREA BETWEEN ANCHOR POST PRODUCTS CO. AND ACE GALVANIZING.

Requirement: See Progress Report #1.

Status: The electrical transformer was closely inspected and a certification by Seattle City Light indicates that the oil contains less than 50 PPM/PCB. Nevertheless, the area is fenced and secured from employee intervention. Photos of inspection decal were provided in Progress Report #1. Additionally, the areas around the air compressor tank, gasoline pumps and the western bank have been cleaned and retention walls constructed around the gasoline pump. (See Photo Series #6.)

7. DEFINE ACE GALVANIZING INDUSTRIAL PROCESS-BASIC DRAWING AND OVERLAYS.

Requirement: See Progress Report #1.

Status: A description of the hot-dip galvanizing and pickling and oiling processes along with flow diagrams and overlays was provided in Progress Report #2.

STORM WATER MANAGEMENT PLAN (Drainage System)

In general terms and in layman language, storm water drainage on the Ace Galvanizing property flows from west to east, following natural land contours toward the Duwamish River. Care has been taken to isolate and contain all materials and fluids associated with the galvanizing process from surface water entering the storm drainage system leading to the Duwamish. The photos contained in this report were taken to demonstrate the concern for containment and housekeeping in order to insure that there is no co-mingling of production associated materials with natural surface waters - this has been accomplished.

Attached as Enclosure #1 is a schematic of the Storm Water Management Plan (Drainage System). As the schematic indicates, surface waters either flow to the 96th Street storm drainage system (running west to east), or they flow southeasterly to the Seattle City Light gully. Most of the surface water run-off emanating on the hillside west of the plant property flows southeasterly away from Ace Galvanizing and into the Seattle City Light gully and stream. The surface waters that are caught or fall on the paved surfaces of the Ace facility flow to the 96th Street utility drainage system as indicated on the schematic. The most critical storm drainage collection point is located at the southern end of the galvanizing building. This collection point has been expanded to accomodate the bulk of the surface run-off directed to that location by outside containment walls and slope of the land. Once collected here, the drainage pipe leads directly to the 96th Street utility.

This completes Progress Report #3 and final report concerning the DOE Response Team noted deficiencies. Work will now be devoted to reducing the slag generated by the galvanizing process and to also lower the copper, nickel and zinc content. In the interim, attention will be devoted to containment and housekeeping.

Sincerely,

Michael Buckland

Michael Buckland, General Manager

MB/fb

Enclosure as noted.

cc: N.W. Reginal Response Team
Attention: Mr. Ron Devitt
Dept. of Ecology
4350 - 150th Avenue N.E.
Redmond, WA 98052

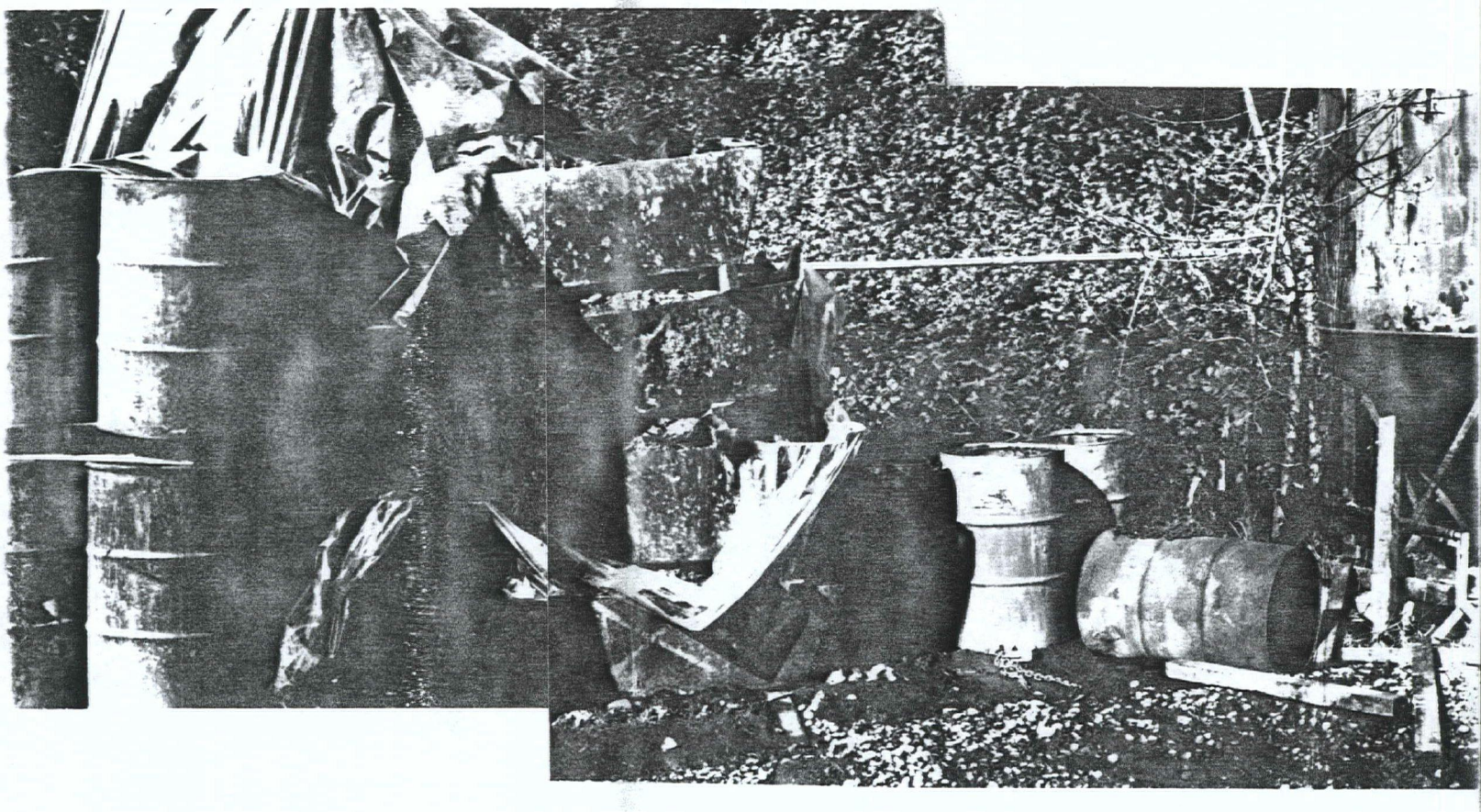
Mr. Carl Kitz
U.S. EPA, MS-HW113
1200 - 6th Avenue
Seattle, WA 98101

Mr. Steven J. Burke, R.S.
Toxic and Hazardous Waste Dept.
Seattle/King County
1510 Public Safety Building
Seattle, WA 98104

PHOTO SERIES #1

Area shere barreled by-products were stored. Western-side of Ace Galvanizing.

BEFORE PHOTOS



AFTER PHOTO

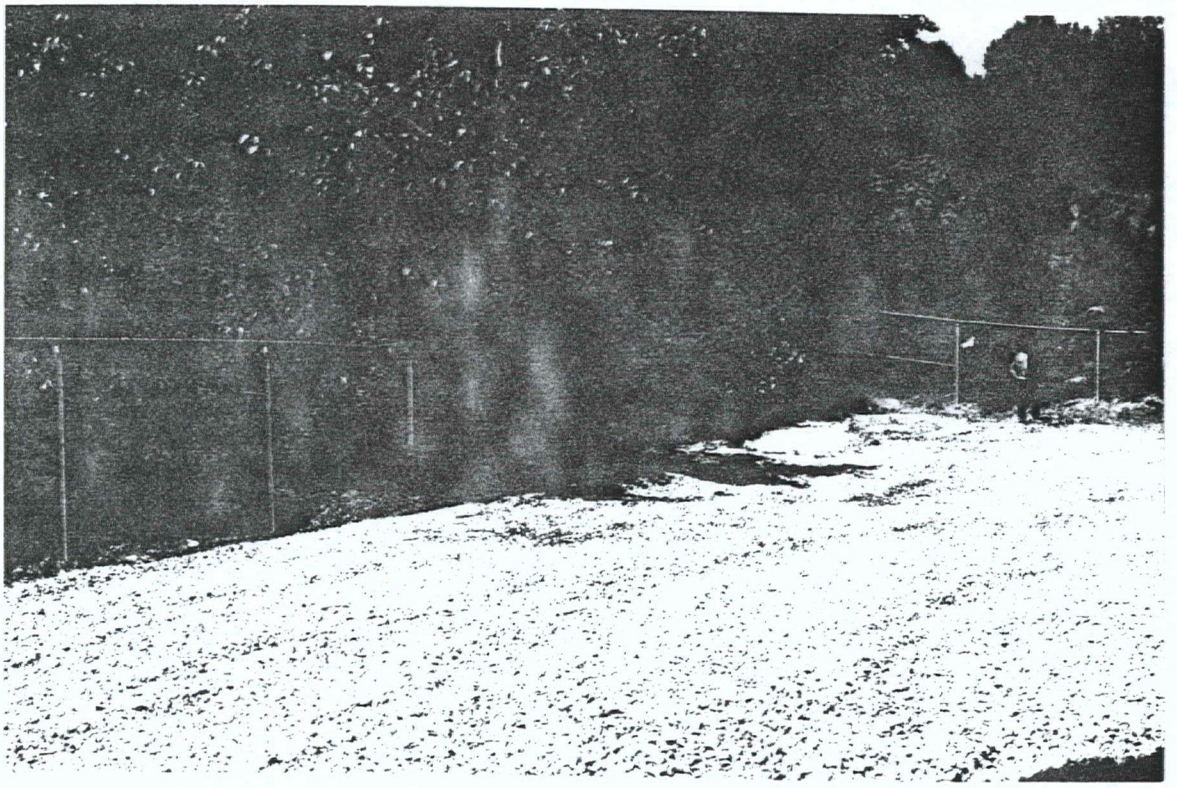
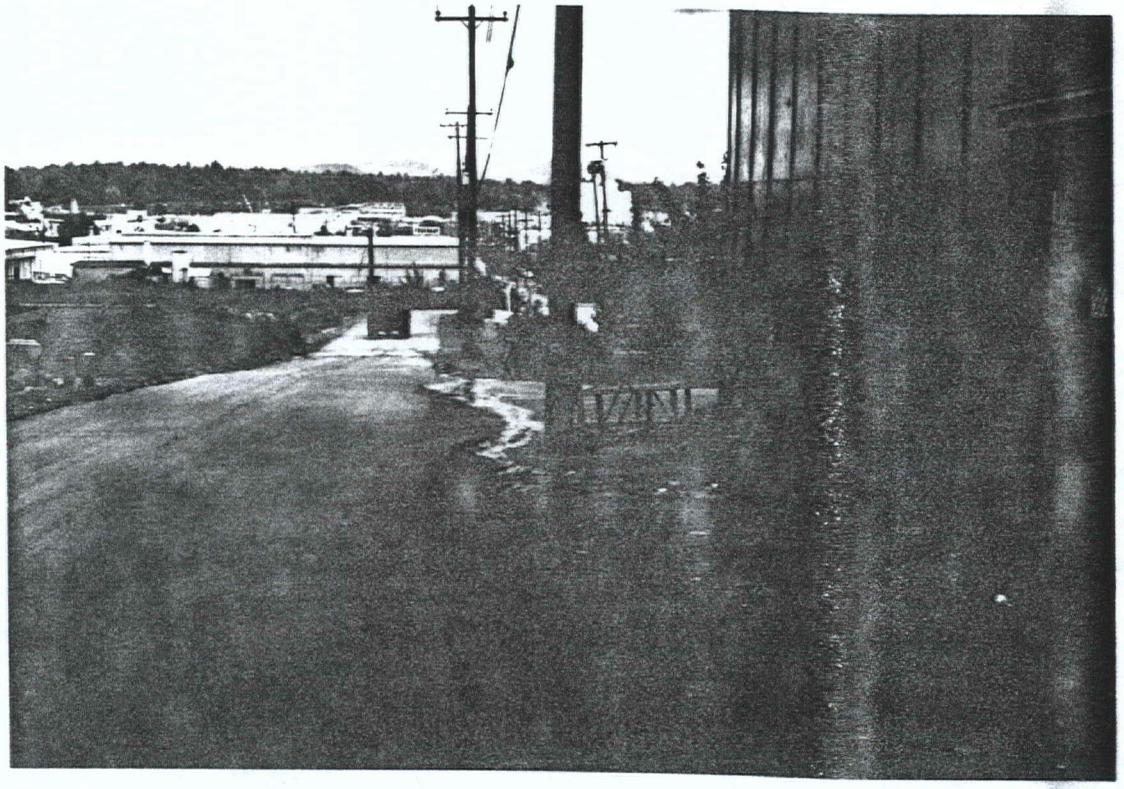
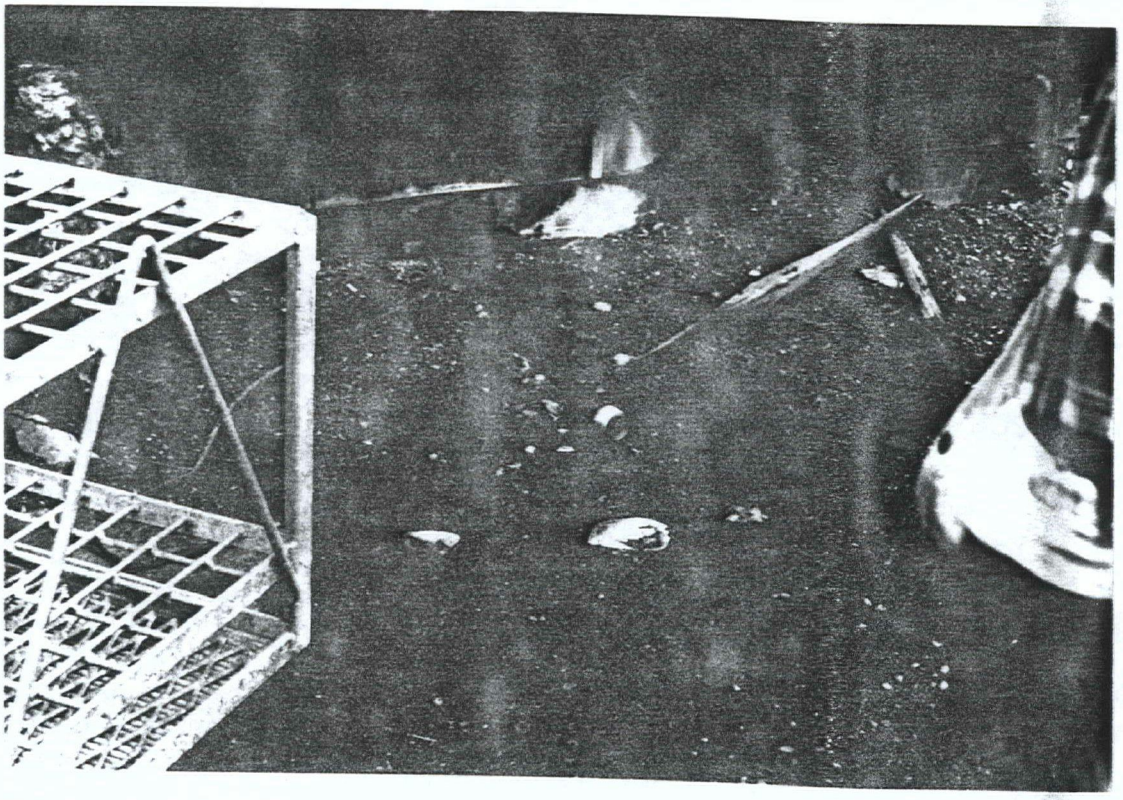


PHOTO SERIES #2

Area on north-side of galvanizing building where water from the boiler flow-down operation was running outside of the building.

BEFORE PHOTOS



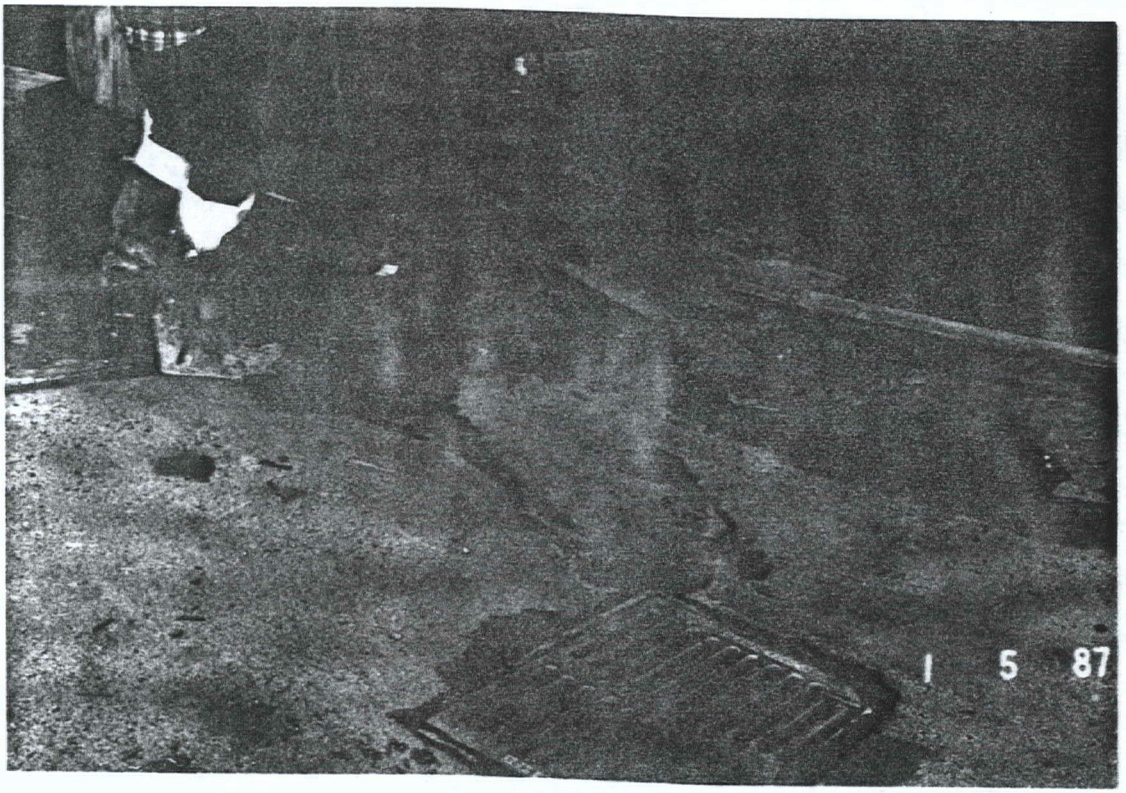


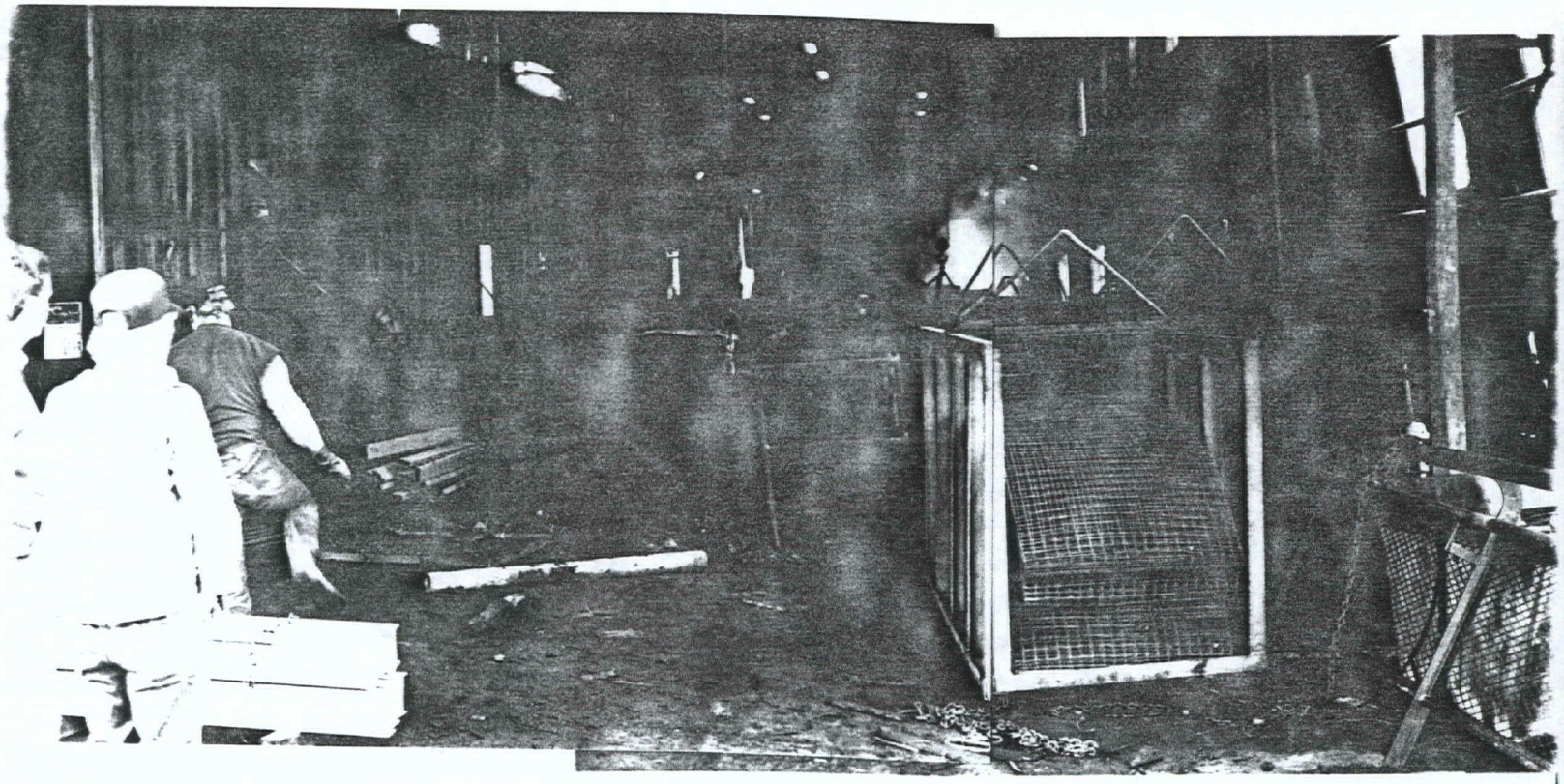
AFTER PHOTO

PHOTO SERIES #3

Storm drainage at southern-end of galvanizing building-secondary containment within the galvanizing building and concrete berms and drainage ditches.

BEFORE PHOTOS





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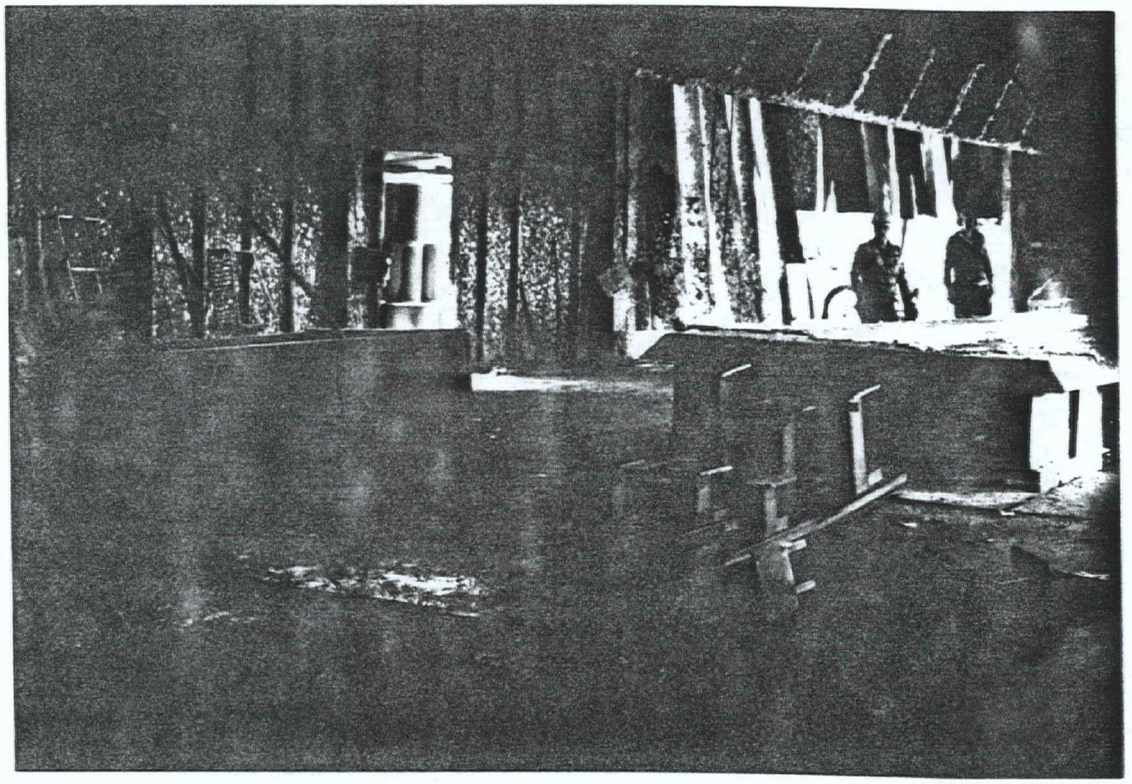

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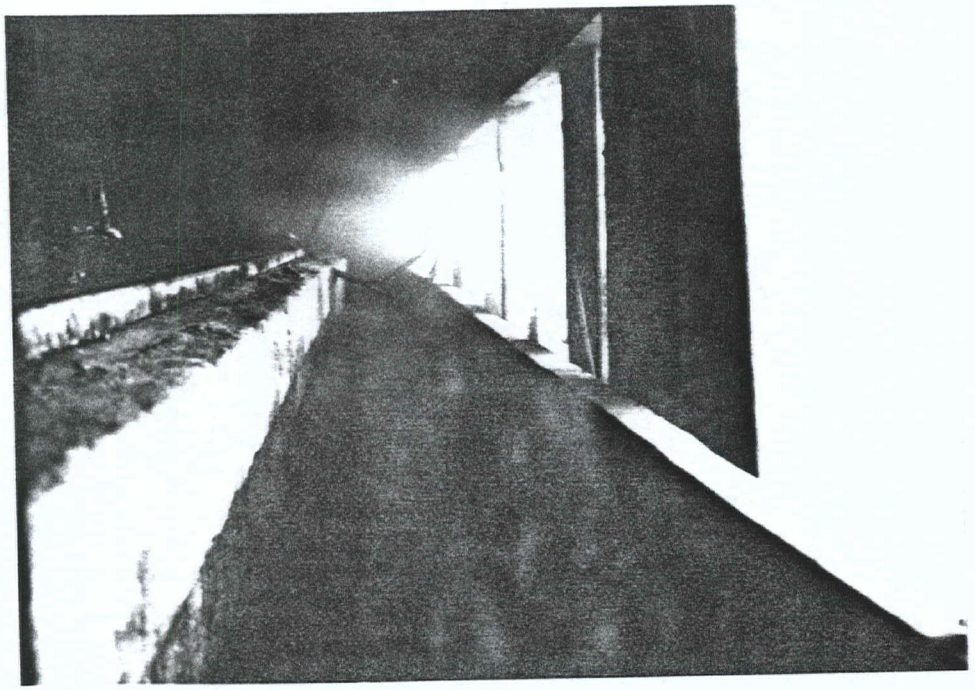

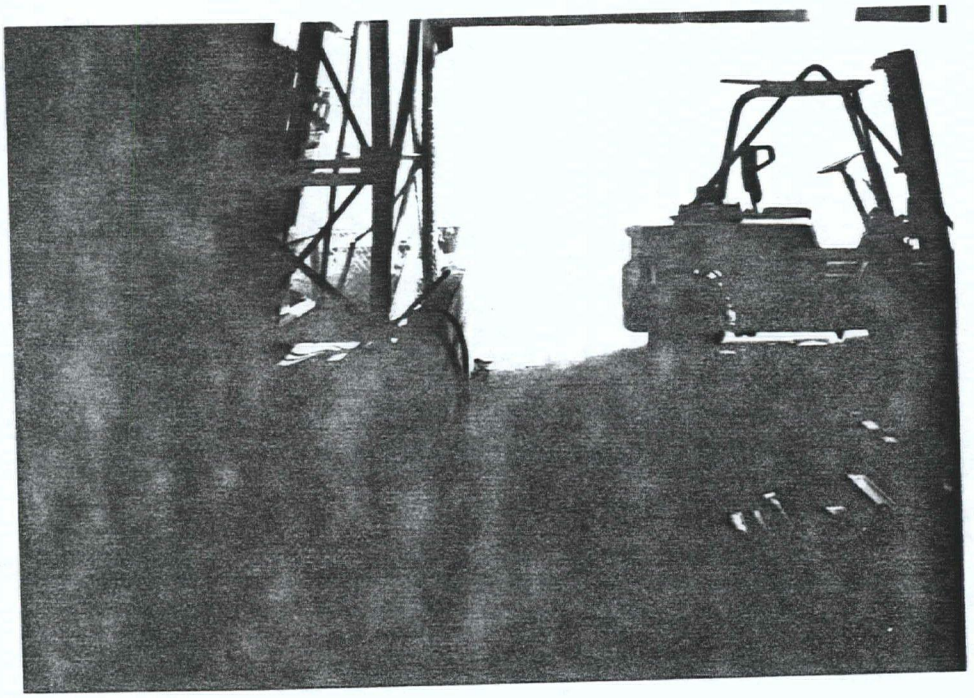

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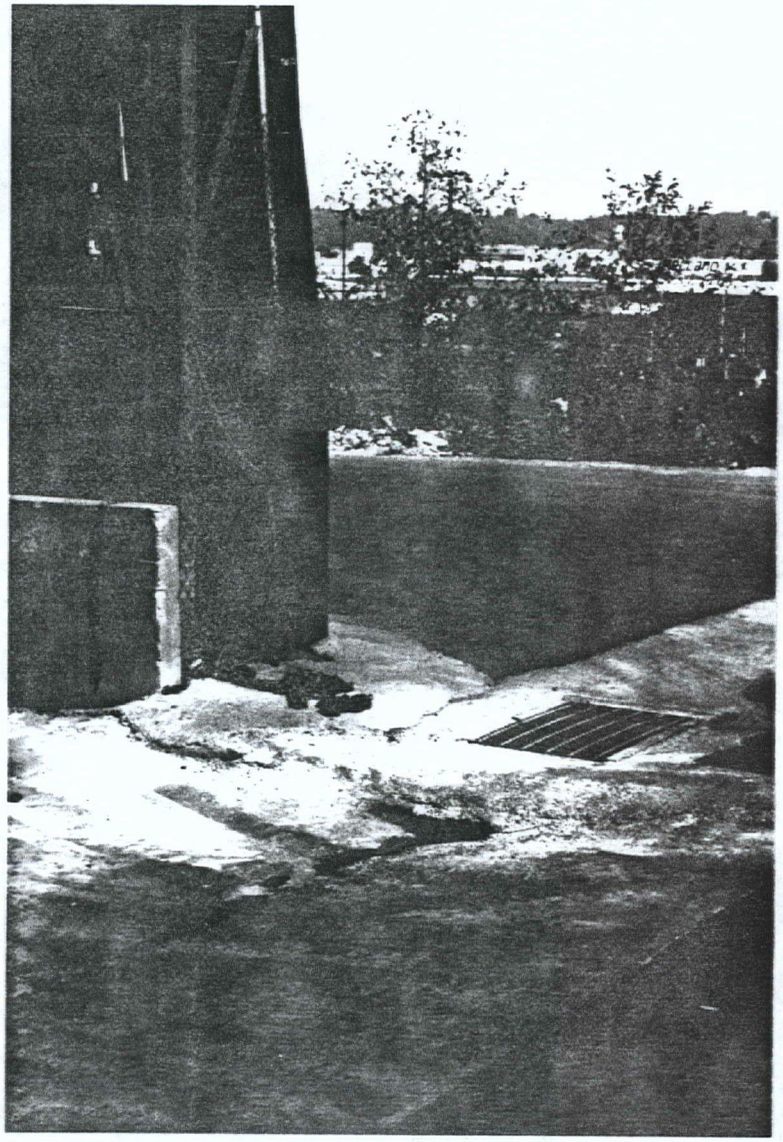

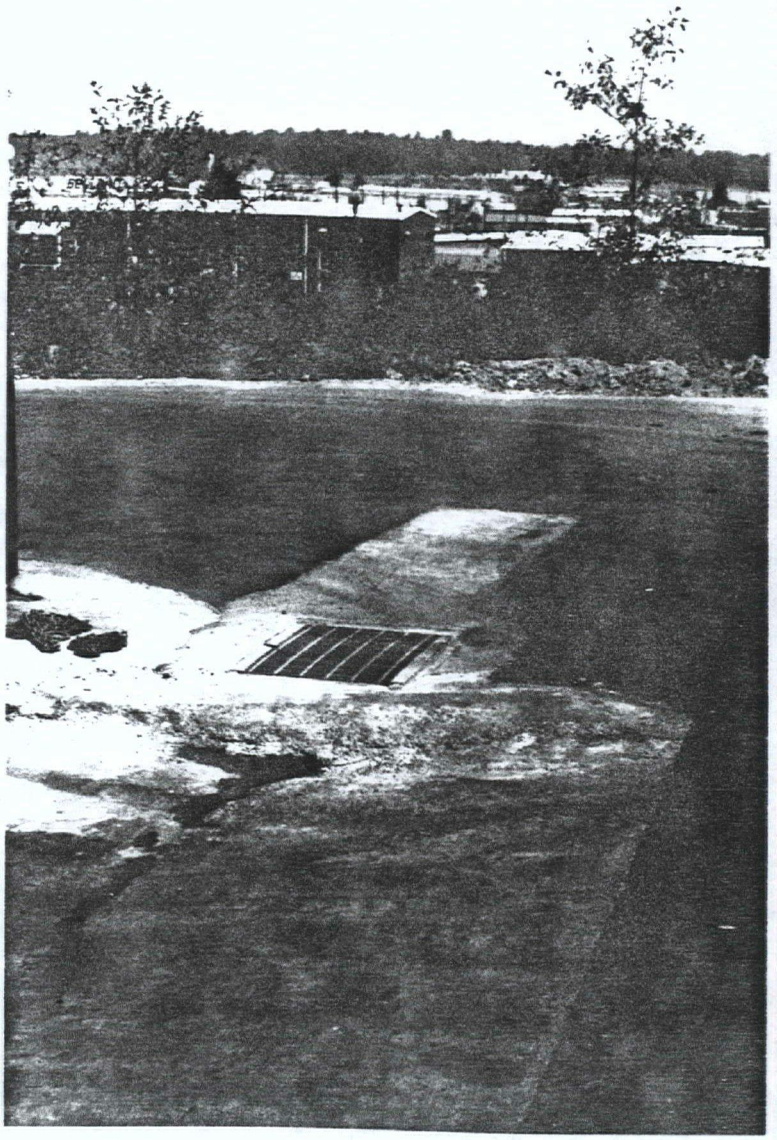

PHOTO SERIES # 4

Condition and location of dumpster

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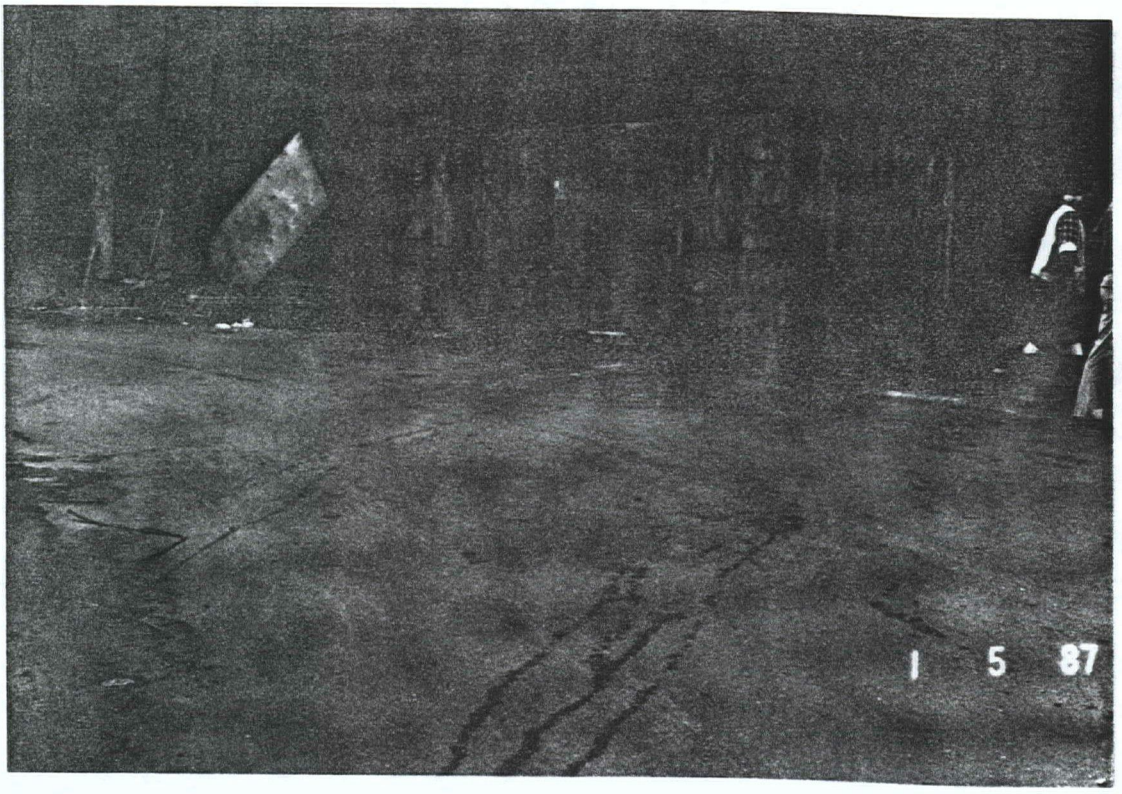

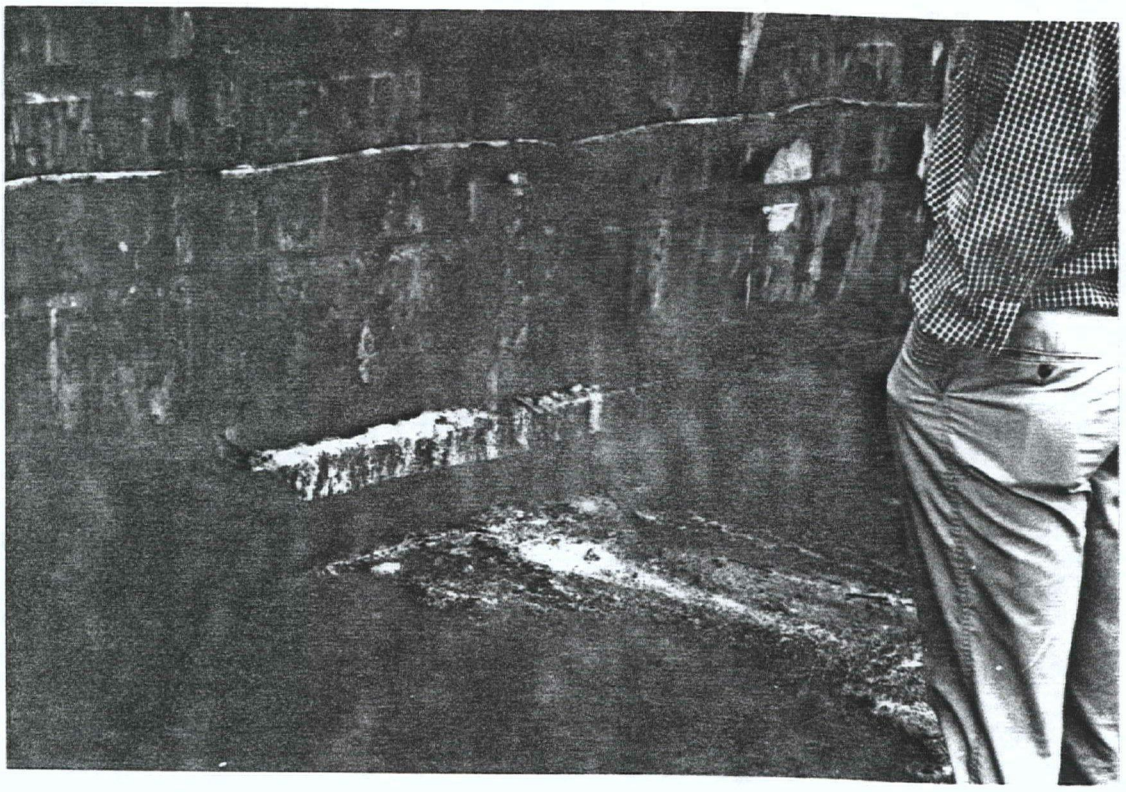

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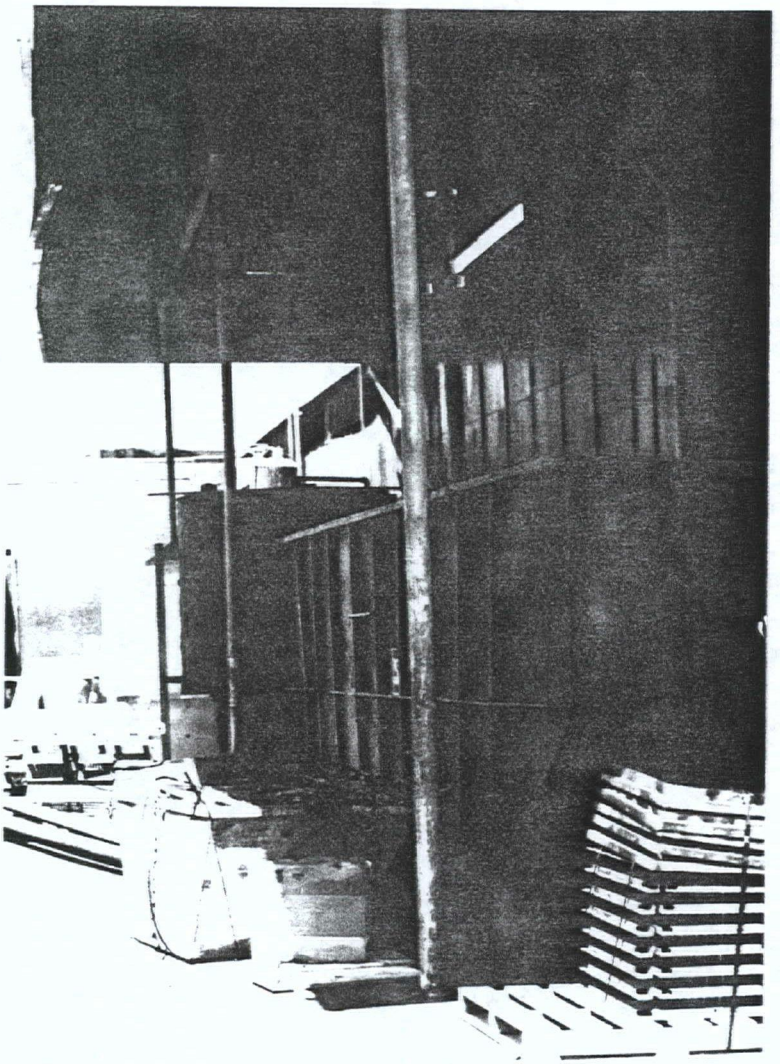

PHOTO SERIES #5

Contianment and Housekeeping

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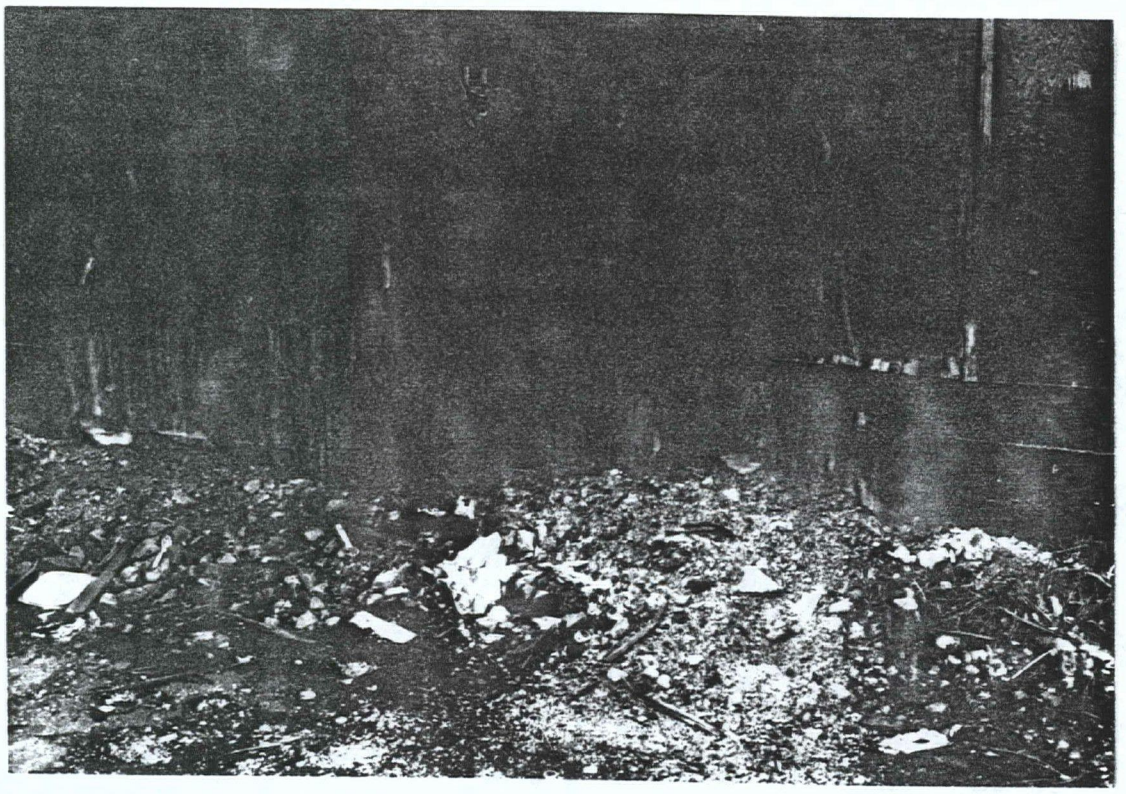

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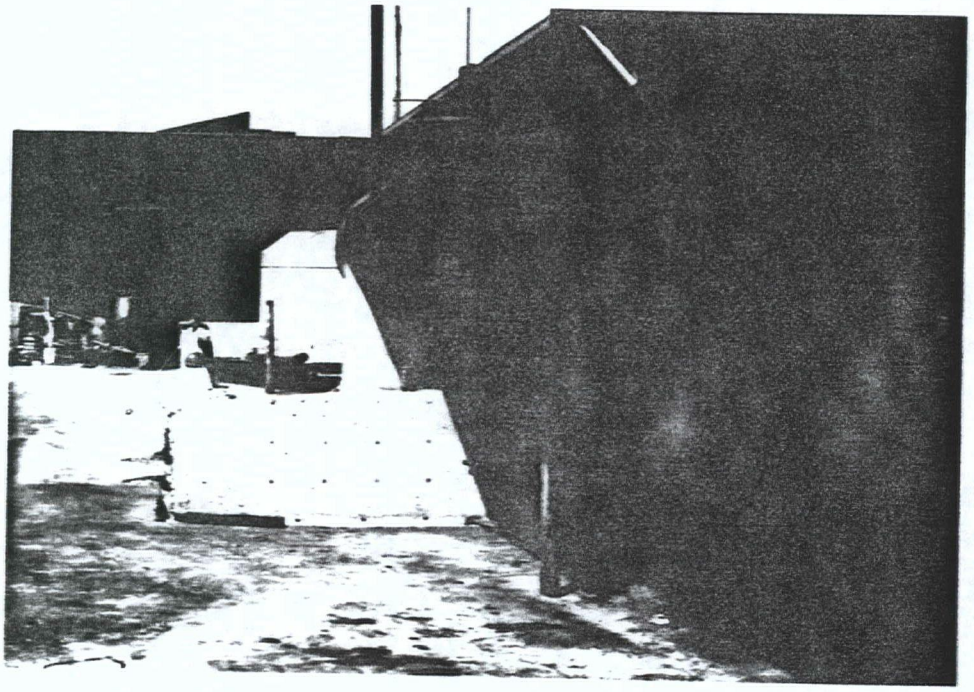

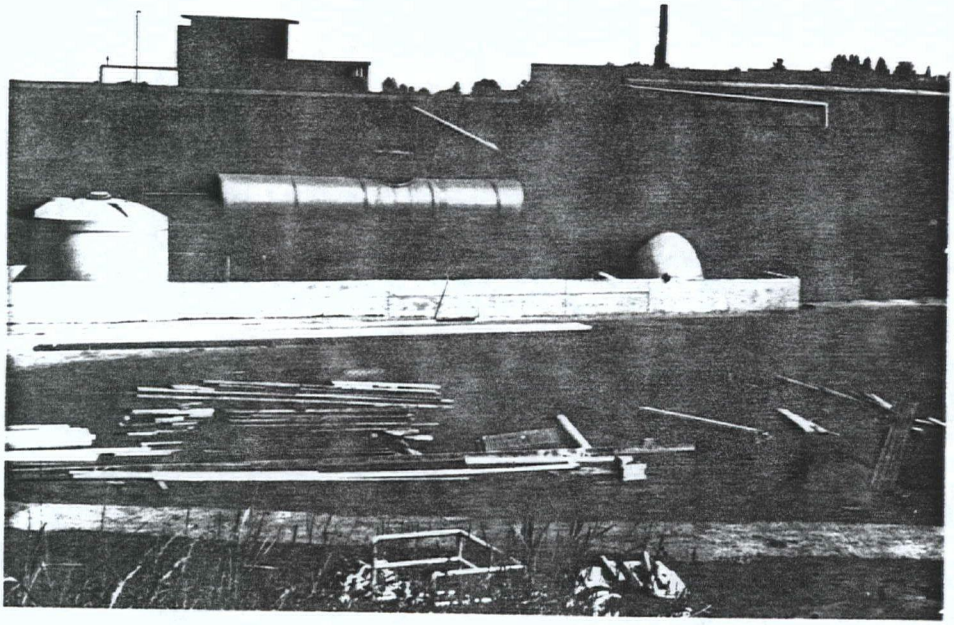

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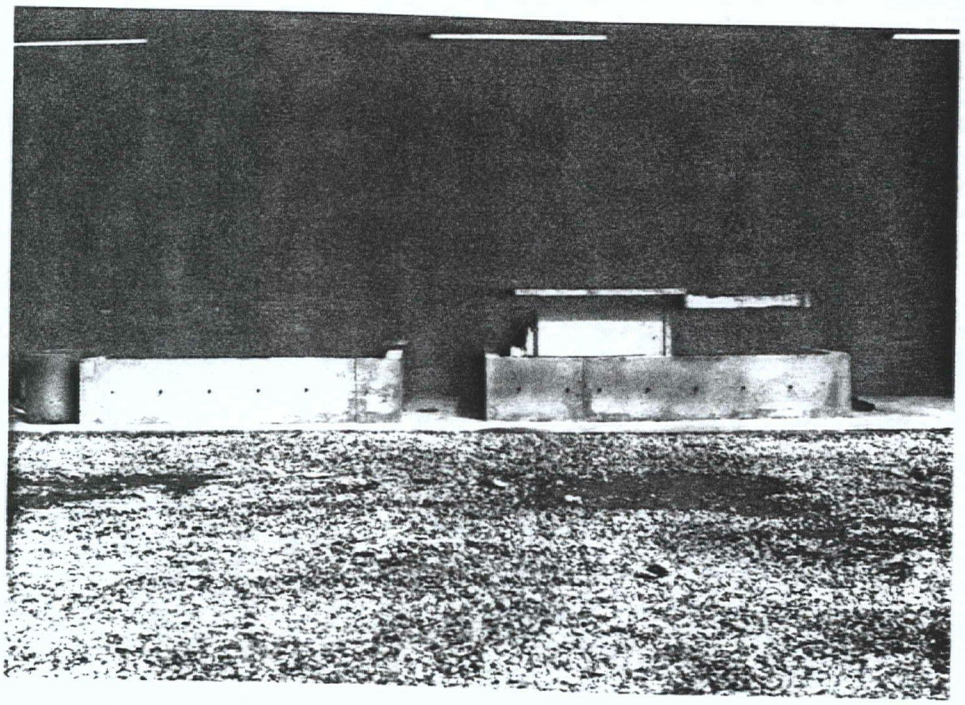

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